

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re:	)	Chapter 11
	)	
VELSICOL CHEMICAL LLC, et al.,	)	Case No. 23-12544
	)	
Debtor. <sup>1</sup>	)	Honorable David D Cleary
	)	
	)	(Jointly Administered)
	)	
	)	<b>Hearing Date: April 2, 2025</b>
	)	<b>Hearing Time: 10:00 a.m.</b>

**NOTICE OF MOTION**

TO: See attached list

PLEASE TAKE NOTICE that on Wednesday April 2, 2025 at 10:00 a.m., I will appear before the Honorable Judge David D. Cleary, or any judge sitting in that judge's place, **either** in courtroom 644 in the Dirksen United States Courthouse, 219 S. Dearborn Street, Chicago, Illinois, **or** electronically as described below, and present the **FIRST INTERIM FEE APPLICATION OF K&L GATES LLP AS SPECIAL ENVIRONMENTAL COUNSEL TO THE DEBTORS AND DEBTORS IN POSSESSION FOR THE PERIOD JUNE 12, 2024 THROUGH NOVEMBER 30, 2024**, a copy of which is attached.

**Important: Only parties and their counsel may appear for presentment of the motion electronically using Zoom for Government. All others must appear in person.**

**To appear by Zoom using the internet**, go to this link: <https://www.zoomgov.com/>. Then enter the meeting ID and passcode.

**To appear by Zoom using a telephone**, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode.

**Meeting ID and passcode.** The meeting ID for this hearing is **161 122 6457**, and the passcode is **Cleary644**.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without calling it.

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<sup>1</sup> The Debtors in these Cases are Velsicol Chemical, LLC, Velsicol Chemical Holdings Corporation, and Resnovae Holdings Corp.

Date: March 5, 2025

***VELSICOL CHEMICAL, LLC, VELSICOL  
CHEMICAL HOLDINGS CORPORATION  
and RESNOVAE HOLDINGS CORP.***

By: /s/ Jeffrey M. Schwartz

One of Their Attorneys

Jeffrey M. Schwartz, (#6209982)

**MUCH SHELIST, P.C.**

191 N. Wacker Drive, Suite 1800

Chicago, Illinois 60606

Telephone: (312) 521-2000

Facsimile: (312) 521-3000

jschwartz@muchlaw.com

*Counsel to the Debtors*

**CERTIFICATE OF SERVICE**

I certify that on March 5, 2025, true copies of this notice and the attached motion referred to therein were served upon the parties listed and indicated on the ECF Registrants shown below via the Court's Electronic Notice for Registrants

By: /s/ Jeffrey M. Schwartz

**SERVICE LIST**

**Via ECF**

- Patrick S Layng [USTPRegion11.ES.ECF@usdoj.gov](mailto:USTPRegion11.ES.ECF@usdoj.gov)
- BMC Group, Inc [tfeil@bmcgroup.com](mailto:tfeil@bmcgroup.com), [evalles@bmcgroup.com](mailto:evalles@bmcgroup.com), [lruppaner@bmcgroup.com](mailto:lruppaner@bmcgroup.com)
- Benjamin Blustein on behalf of Creditor District of Columbia [bblustein@lawmbg.com](mailto:bblustein@lawmbg.com)
- Matthew Brash [mbrash@newpointadvisors.us](mailto:mbrash@newpointadvisors.us), [I003@ecfcbis.com](mailto:I003@ecfcbis.com); [jnoack@newpointadvisors.us](mailto:jnoack@newpointadvisors.us)
- Eric J. Breithaupt on behalf of Creditor Pharmacia LLC [ebreithaupt@joneswalden.com](mailto:ebreithaupt@joneswalden.com), [jwdistribution@joneswalden.com](mailto:jwdistribution@joneswalden.com)
- Shantel Chapple Knowlton on behalf of Creditor District of Columbia [schappleknowlton@edelson.com](mailto:schappleknowlton@edelson.com)
- David C. Christian, II on behalf of Creditor Transportation Insurance Company [dchristian@dca.law](mailto:dchristian@dca.law)
- Scott D. Fink on behalf of Creditor Toyota Industries Commercial Finance, Inc [ecfnil@weltman.com](mailto:ecfnil@weltman.com)
- Leon Jones on behalf of Creditor Pharmacia LLC [ljones@joneswalden.com](mailto:ljones@joneswalden.com), [jwdistribution@joneswalden.com](mailto:jwdistribution@joneswalden.com)
- Kevin H Morse on behalf of Creditor District of Columbia [kmorse@clarkhill.com](mailto:kmorse@clarkhill.com), [blambert@clarkhill.com](mailto:blambert@clarkhill.com)
- Daniel Robertson on behalf of Creditor Pension Benefit Guaranty Corporation [robertson.daniel@pbgc.gov](mailto:robertson.daniel@pbgc.gov), [efile@pbgc.gov](mailto:efile@pbgc.gov)
- Jeffrey M Schwartz on behalf of Debtors [jschwartz@muchlaw.com](mailto:jschwartz@muchlaw.com)
- Ryan Seidemann on behalf of Creditor State of Louisiana, Department of Environmental Quality [seidemannr@ag.state.la.us](mailto:seidemannr@ag.state.la.us)
- Andrea Wong on behalf of Creditor Pension Benefit Guaranty Corporation [wong.andrea@pbgc.gov](mailto:wong.andrea@pbgc.gov)
- TN Dept of Env't and Conservation [stuart.wilson-patton@ag.tn.gov](mailto:stuart.wilson-patton@ag.tn.gov)
- United States Environmental Protection Agency [matthew.indrisano@usdoj.gov](mailto:matthew.indrisano@usdoj.gov)

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re:	)	Chapter 11
	)	
VELSICOL CHEMICAL LLC, et al.,	)	Case No. 23-12544
	)	
Debtor. <sup>1</sup>	)	Honorable David D Cleary
	)	
	)	(Jointly Administered)
	)	
	)	<b>Hearing Date: April 2, 2025</b>
	)	<b>Hearing Time: 10:00 a.m.</b>

**FIRST INTERIM FEE APPLICATION OF K&L GATES LLP AS SPECIAL  
ENVIRONMENTAL COUNSEL TO THE DEBTORS AND DEBTORS IN  
POSSESSION, FOR THE PERIOD FROM JUNE 12, 2024  
THROUGH AND INCLUDING NOVEMBER 30, 2024**

K&L GATES, LLP (“KLG”), special environmental counsel to Velsicol Chemical, LLC, Velsicol Chemical Holdings Corporation, and Resnovae Holdings Corp. (collectively, “Debtors”), as debtors and debtors in possession in the above-captioned chapter 11 cases (the “Chapter 11 Cases”), hereby submits its first interim fee application (the “Application”) for allowance of compensation for professional services provided in the amount of \$86,891.00 and reimbursement of actual and necessary expenses in the amount of \$0.00 that KLG incurred for the period from June 12, 2024 through November 30, 2024 (the “Application Period”). In support of this Application, KLG respectfully states as follows:

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<sup>1</sup> The Debtors in these Cases are Velsicol Chemical, LLC, Velsicol Chemical Holdings Corporation, and Resnovae Holdings Corp.

## **JURISDICTION AND VENUE**

1. The Court has jurisdiction over this matter pursuant to sections 1334 and 157(a) of title 28 of the United States Code and Internal Operating Procedure 15(a) of the United States District Court for the Northern District of Illinois. This is a core proceeding pursuant to section 157(b)(2) of title 28 of the United States Code. Venue is proper in this district pursuant to sections 1408 and 1409 of title 28 of the United States Code.

2. The statutory predicates for the relief requested herein are sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 5082-1 of the Local Rules of the United States Bankruptcy Court for the Northern District of Illinois.

## **BACKGROUND**

### **A. Filing of the Chapter 11 Cases**

3. On September 21, 2023 (the “Petition Date”), each of the Debtors filed voluntary petitions under Chapter 11 of the Bankruptcy Code. The Debtors are managing their operations and financial affairs as debtors-in-possession.

### **B. The Debtors’ Retention of KLG**

4. On October 25, 2023, the Debtors filed an application to retain and employ Much Shelist P.C. as their general bankruptcy attorneys in the Chapter 11 Cases [Docket No. 65], which the Court approved on November 1, 2023 [Docket No. 77].

5. Thereafter, on July 24, 2024, the Debtors filed the *Debtors’ Application to Employ K&L Gates, LLP as Special Environmental Counsel*, with such retention dating back to June 12, 2024 [Docket No. 162] (the “KLG Retention Application”).

6. On July 31, 2024, the Court entered the *Order Authorizing Employment of K&L Gates as Special Environmental Counsel* [Docket No. 163] (the “Retention Order”).

**RELIEF REQUESTED**

7. KLG rendered services on behalf of the Debtors during the Application Period, for which it seeks interim allowance of compensation and reimbursement of expenses. By this Application, KLG seeks an order: (1) allowing KLG \$86,891.00 in compensation and \$0.00 in reimbursable expenses for the Application Period as chapter 11 administrative expenses of the Debtors' estates pursuant to sections 503(b) and 507(a)(1) of the Bankruptcy Code, and (2) authorizing payment of such allowed amounts to KLG.

8. KLG performed the services for which it is seeking compensation on behalf of the Debtors and their estates, and not on behalf of any committee, creditor, or other entity.

9. KLG has received no payment and no promises for payment from any source other than the Debtors for services provided or to be provided in any capacity whatsoever in connection with these Chapter 11 Cases.

10. Pursuant to Bankruptcy Rule 2016(b), KLG has not shared, nor has KLG agreed to share (a) any compensation it has received or may receive with another party or person other than with the partners, counsel, and associates of KLG or (b) any compensation another person or party has received or may receive.

**DISCUSSION**

11. Section 330(a) of the Bankruptcy Code provides, in pertinent part, that:

[T]he court may award ... reasonable compensation for actual, necessary services rendered by the ... attorney and by any paraprofessional person ... and ... reimbursement for actual, necessary expenses.... In determining the amount of reasonable compensation to be awarded, the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including – (A) the time spent on such services; (B) the rates charged for such services; (C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under [the Bankruptcy Code]; (D) whether the services were

performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed; and (E) whether the compensation is reasonable, based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

12. The Seventh Circuit Court of Appeals has stated that:

The computation of hourly fees depends on the number of hours “reasonably” expended, the hourly rate of each [professional], the calculation of the time value of money (to account for delay in payment), potential increases and decreases to account for risk and the results obtained, and a complex of other considerations under the heading of “billing judgment.”

*Kirchoff v. Flynn*, 786 F.2d 320, 325 (7th Cir. 1986). Additionally, other courts of appeal have recognized that:

[I]t is important for a court to maintain a sense of overall proportion ... and not become enmeshed in meticulous analysis of every detailed facet of the professional representation.... It is easy to speculate in retrospect that the work could have been done in less time or with fewer attorneys or with an associate rather than a partner. On the other hand, it is also possible that [the client] would not have enjoyed the success it did had its counsel managed matters differently.

*Boston & Main Corp. v. Moore*, 776 F.2d 2, 10 (1st Cir. 1985) (citations and internal quotation marks omitted).

13. In reviewing the Application, the Court should be guided by the Seventh Circuit’s instruction to ascertain whether such services were rendered and billed in accordance with the established market for legal services in similar matters:

[I]t is not the function of judges in fee litigation to determine the equivalent of the medieval just price. It is to determine what the lawyer would receive if he were selling his services in the market rather than being paid by court order.

*Steinlauf v. Con’t Ill. Corp. (In re Con’t Ill. Sec. Litig.)*, 962 F.2d 566, 568 (7th Cir. 1992); see *Mann v. McCombs (In re McCombs)*, 751 F.2d 286, 288 (8th Cir. 1984) (reasoning that section 330 “is meant to encourage high standards of professional legal practice in the bankruptcy

courts.... Bankruptcy courts must consider whether the fee awards are commensurate with fees for professional services in non-bankruptcy cases, thus providing sufficient economic incentive to practice in bankruptcy courts.”) (internal citations omitted).

14. In *Continental Securities*, the Seventh Circuit found error in the lower court’s practice of: (a) placing ceilings on the hourly rates of all lawyers; (b) refusing to allow paralegal services to be compensated at market rate; (c) refusing to award a risk multiplier; (d) making large across-the-board cuts in research time; (e) making large across-the-board cuts in conference time; and (f) refusing to allow attorneys to bill computerized legal research services (*e.g.*, LEXIS). *Cont’l Ill. Sec. Litig.*, 962 F.2d at 568–70.

15. In evaluating the Application, the Court should consider the novelty and difficulty of the issues presented, the skill required to perform the legal services properly, the preclusion of other employment caused by KLG’s retention in these cases, the customary fees charged in similar cases, the existence of time limits under which the services were rendered, the results obtained, the experience and ability of the attorneys involved, and the amount of awards of compensation in similar cases. *See In re Alberto*, 121 B.R. 531, 534 (Bankr. N.D. Ill. 1990).

16. KLG is entitled to receive interim compensation in the amount of \$86,891.00 for services rendered during the Application Period and \$0.00 for reimbursement of expenses incurred during the Application Period. The following is a summary of time expended, by individual, during the Application Period.



Timekeeper	Year of Bar Admission	Hours	Rate/hr.	Total
David L. Rieser	1980	81.3	\$810.00	\$65,853.00
Jonathan N. Edel	2013	16.2	\$720.00	\$11,664.00
Malory M. Pascarella	2018	18.2	\$520.000	\$9,464.00
<b>TOTAL</b>		<b>115.7</b>		<b>\$86,891.00</b>

17. KLG separates its time between two separate billing numbers for this project, so its professionals could classify their time entries. For the purpose of KLG's limited role as special environmental counsel, only two categories were needed: (a) Environmental Liability Analysis and Settlement and (b) Retention and Fee Applications.

18. Attached hereto as Exhibits 1 and 2 are statements of legal services rendered related to each of the foregoing categories. The services for each category are listed chronologically, separated into monthly invoices.<sup>2</sup> The services were rendered in connection with and in furtherance of the description of services included in the KLG Retention Application, specifically related to resolving the Debtors' Environmental Liabilities (as defined in the KLG Retention Application). This Application complies with the standards enunciated in *In re Continental Securities Litigation*, 572 F. Supp. 931 (N.D. Ill. 1983), *modified by* 692 F.2d 766 (7<sup>th</sup> Cir. 1992). A summary of the time billed to each category, total cost thereof, and description of work performed follows.

**A. Environmental Liability Analysis and Settlement (Exhibit 1):** A total of 99.5 hours at a cost of \$75,317.00 was expended by KLG's attorneys on reviewing and analyzing

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<sup>2</sup> Though June, July, October, and November are separated into monthly invoices, August and September are combined into a single invoice.

information related to various potential superfund locations related to the Debtors' operations, coordinating with Debtors' employees and internal counsel as well as counsel for the various federal and state regulators re same, and assessing potential liability related thereto. These services included generally providing assessment to the Debtors with respect to their potential environmental liabilities and exposure and assisting the Debtors in formulating a strategy to deal with the same through the Chapter 11 Cases.

**B. Retention and Fee Applications (Exhibit 2):** KLG attorneys expended 16.2 hours at a cost of \$11,664.00 in connection with researching and preparing its retention and fee applications (which for this period include only KLG's original retention application). This category includes time spent by KLG performing conflicts searches, researching applicable standards for retention of special counsel and disclosure of conflicts, and drafting (and obtaining approval of) the KLG Retention Application.

### **REASONABLE EXPENSES INCURRED**

19. KLG did not incur any expenses during the Application Period and, therefore, it does not seek reimbursement.

### **BENEFIT TO THE ESTATES**

20. KLG has remained active on all matters in its representation of the Debtors as counsel during these cases. KLG submits that the services set forth herein benefitted the estates and their creditors by ensuring that the Debtors' assets were properly preserved and administered, and that they gained the highest value under the circumstances to maximize the potential recovery for general unsecured creditors.

### **RESERVATION OF RIGHTS**

21. To the extent KLG incurred charges for services rendered or expenses relating to the Application Period but were not processed prior to the preparation of this Application, or KLG

has for any other reason not yet sought compensation or reimbursement of expenses herein with respect to any services rendered or expenses incurred during the Application Period, KGL reserves the right to supplement this Application or request additional compensation for such services and expenses as part of a future application.

**NOTICE**

22. Twenty-one days' notice of this Application has been provided to (i) the U.S. Trustee; (ii) the Subchapter V Trustee; and (iii) any party that has appeared or requested notice in these Cases.

**WHEREFORE**, K&L Gates, LLP, respectfully requests that the Court enter an order:

(a) allowing KLG, on an interim basis, \$86,891.00 in compensation for the Application Period as chapter 11 administrative expenses of the Debtors' estates pursuant to sections 503(b) and 507(a)(1) of the Bankruptcy Code;

(b) allowing KLG, on an interim basis, \$0.00 in reimbursable expenses for the Application Period as chapter 11 administrative expenses of the Debtors' estates pursuant to sections 503(b) and 507(a)(1) of the Bankruptcy Code;

(c) authorizing the Debtors to pay KLG \$86,891.00 in compensation and \$0.00 in reimbursable expenses incurred during the Application Period; and

(d) granting such other and further relief as the Court deems just and proper.

Date: March 5, 2025

**K&L Gates, LLP**

By: 

David L. Rieser

David L. Rieser (#3128590)

**K&L Gates, LLP**

70 West Madison St., Suite 3300

Chicago, Illinois 60602

Telephone: (312) 372-1121

Email: david.rieser@klgates.com

# **EXHIBIT 1**

**K&L GATES****K&L GATES LLP**  
70 WEST MADISON STREET

SUITE 3100

CHICAGO, IL 60602-4207

T 312.372.1121 F 312.827.8000 klgates.com  
Tax ID No. 25 0921018

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Velsicol Chemical, LLC  
Tim Horn, CEO  
10400 West Higgins Road, Ste. 700  
Rosemont, IL 60018

Invoice Date: July 17, 2024  
Invoice Number: 100049505  
K&L Gates Contact: David Rieser

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**K&L Gates Reference:** 3724632.00003 - Velsicol – Environmental Issues

**For professional services rendered through June 30, 2024**

**INVOICE SUMMARY**

Professional Service Fees	<b><u>Total USD \$</u></b>
	15,714.00
<b>Total Current Invoice</b>	<b><u>\$15,714.00</u></b>

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Due and Payable upon Receipt

Mail To: K&L Gates LLP, P.O. Box 830304, Philadelphia, PA 19182-0304

Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Rd-Ste 330, Mt. Laurel, NJ 08054-3415

Wire/ACH/EDI Instructions: Receiving Bank: PNC Bank N.A.,  
500 First Ave 92  
Pittsburgh, PA 15219

Beneficiary: K&L Gates LLP  
Acct No.: 1077692783

Routing/ABA: 043000096  
Swift Code: PNCCUS33

Please reference client/matter number in electronic payment details and email the remittance advice to [AccountsReceivableSEA@klgates.com](mailto:AccountsReceivableSEA@klgates.com) with invoice number(s) and amounts.

Velsicol Chemical, LLC

Invoice Date: July 17, 2024

Invoice Number: 100049505

K&amp;L Ref. Number: 3724632.00003

**DETAILS OF ACCOUNT****Professional Services**

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>	<b><u>Amount</u></b>
12-JUN-24	David Rieser	2.20	Emails with T. Horn (Velsicol) re: status (.40), review information re: superfund sites (1.80)	1,782.00
13-JUN-24	David Rieser	1.80	Review site information re: Marble Top	1,458.00
14-JUN-24	David Rieser	3.00	Conference with T. Horn (Velsicol) re: bankruptcy issues and next steps (.70), review Memphis facility information (2.30)	2,430.00
17-JUN-24	David Rieser	2.00	Review RCRA regulations	1,620.00
18-JUN-24	David Rieser	2.20	Review TDEC rules re: corrective action and permit issuance (1.90); emails with T. Horn (Velsicol) re: additional documents (.30)	1,782.00
19-JUN-24	David Rieser	0.40	Email with T. Horn (Velsicol) re: TDEC call (.20), emails with G. Harvell (Velsicol) re: Velsicol information (.20)	324.00
20-JUN-24	David Rieser	2.50	Emails re: TDEC conferences (.20), emails with G. Harvell (Velsicol) re: RCRA documents (.10), review RCRA documents (2.20)	2,025.00
25-JUN-24	David Rieser	1.80	Prepare for and attend conference with T. Horn (Velsicol) and G. Harvell (Velsicol) re: approach to TDEC and next steps (1.0); review communications with TDEC (.80)	1,458.00
26-JUN-24	David Rieser	1.60	Review RCRA permit re: modification (1.20), emails with G. Harvell (Velsicol) re: completion (.40)	1,296.00
27-JUN-24	David Rieser	1.50	Prepare for and attend conference call with TDEC (.90) ; conference with J. Schwartz (Debtor's counsel) and G. Harvell (Velsicol) re: call and next steps (.40); emails re: next steps (.20)	1,215.00
28-JUN-24	David Rieser	0.40	Emails with G. Harvell (Velsicol) re: technical meetings (.20) and T. Horn (Velsicol) re: proposal status (.20)	324.00
<b>Total Fees</b>		<b>19.40</b>		<b>\$15,714.00</b>

**TIMEKEEPER SUMMARY**

<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Rate</u></b>	<b><u>Amount</u></b>
David Rieser	19.40	810.00	15,714.00
<b>Total Fees</b>	<b>19.40</b>		<b>\$15,714.00</b>

**K&L GATES****K&L GATES LLP**  
70 WEST MADISON STREET

SUITE 3100

CHICAGO, IL 60602-4207

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Tax ID No. 25 0921018

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Velsicol Chemical, LLC  
Tim Horn, CEO  
10400 West Higgins Road, Ste. 700  
Rosemont, IL 60018

Invoice Date: August 23, 2024  
Invoice Number: 100064554  
K&L Gates Contact: David Rieser

**K&L Gates Reference:** 3724632.00003 - Velsicol – Environmental Issues

**For professional services rendered through July 31, 2024**

**INVOICE SUMMARY**

Professional Service Fees	<b><u>Total USD \$</u></b>
	13,203.00
<b>Total Current Invoice</b>	<b><u>\$13,203.00</u></b>

Due and Payable upon Receipt

Mail To: K&L Gates LLP, P.O. Box 830304, Philadelphia, PA 19182-0304

Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Rd-Ste 330, Mt. Laurel, NJ 08054-3415

Wire/ACH/EDI Instructions: Receiving Bank: PNC Bank N.A.,  
500 First Ave 92  
Pittsburgh, PA 15219

Beneficiary: K&L Gates LLP  
Acct No.: 1077692783

Routing/ABA: 043000096  
Swift Code: PNCCUS33

Please reference client/matter number in electronic payment details and email the remittance advice to [AccountsReceivableSEA@klgates.com](mailto:AccountsReceivableSEA@klgates.com) with invoice number(s) and amounts.



Velsicol Chemical, LLC

Invoice Date: August 23, 2024

Invoice Number: 100064554

K&amp;L Ref. Number: 3724632.00003

**DETAILS OF ACCOUNT****Professional Services**

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>	<b><u>Amount</u></b>
01-JUL-24	David Rieser	0.30	Email with T. Horn (Velsicol) re: TDEC call	243.00
08-JUL-24	David Rieser	0.30	Emails re: TDEC call	243.00
09-JUL-24	David Rieser	2.40	Conference with client re: TDEC negotiations (.40), conference with J. Schwartz (Debtor's counsel) re: same (.20), draft term sheet (1.80)	1,944.00
10-JUL-24	David Rieser	0.80	Email with G. Harvell (Velsicol) re: tech meeting (.30), conference call with Velsicol re: next steps (.30), emails re:TDEC meeting (.20)	648.00
11-JUL-24	David Rieser	2.60	Emails re: TDEC meeting (.30), revise term sheet (1.80), email with T. Horn (Velsicol) re: same (.30), email with J. Schwartz (Debtor's counsel) re: same (.20)	2,106.00
12-JUL-24	David Rieser	1.30	Review T. Horn (Velsicol) revision to term sheet (.30); conference with T. Horn (Velsicol) re: same (.20); revise same (.80)	1,053.00
15-JUL-24	David Rieser	1.80	Emails re: T. Horn (Velsicol) re: term sheet (.40); email with G. Harvell (Velsicol) re: TDEC conference(.20), review and revise term sheet (1.20)	1,458.00
16-JUL-24	David Rieser	1.00	Emails with Velsicol re: term sheet and exhibits (.30); conference call with TDEC re: term sheet (.70)	810.00
22-JUL-24	David Rieser	0.40	Email with J. Schwartz (Debtor's counsel) and J. Edel re: retention application	324.00
23-JUL-24	David Rieser	0.50	Email with T. Horn (Velsicol) re: meeting on PRP issues (.30), emails re: PRP sites (.20)	405.00
24-JUL-24	David Rieser	1.20	Emails with G. Harvell (Velsicol) re: status of TDEC discussions (.60), emails with J. Schwartz (Debtor's counsel) re: application to employ (.60)	972.00
25-JUL-24	David Rieser	0.50	Emails with J. Schwartz (Debtor's counsel)re: bankruptcy hearing (.30), emails with T. Horn (Velsicol) re: PRP issues (.20)	405.00
26-JUL-24	David Rieser	1.50	Prepare for and attend conference with T. Horn (Velsicol) and J. Schwartz (Debtor's counsel) re: PRP liability issues	1,215.00
29-JUL-24	David Rieser	1.00	Email with G. Harvell (Velsicol) re: 2002 TDEC settlement (.30) , email with J. Schwartz (Debtor's counsel) re: TDEC outreach (.30), review settlement (.40)	810.00
30-JUL-24	David Rieser	0.40	Emails re: TDEC potential response	324.00
31-JUL-24	David Rieser	0.30	Emails re: PRP follow up	243.00
<b>Total Fees</b>		<b>16.30</b>		<b>\$13,203.00</b>

Velsicol Chemical, LLC

Invoice Date:

August 23, 2024

Invoice Number:

100064554

K&amp;L Ref. Number:

3724632.00003

**TIMEKEEPER SUMMARY**

<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Rate</u></b>	<b><u>Amount</u></b>
David Rieser	16.30	810.00	13,203.00
<b>Total Fees</b>	<b>16.30</b>		<b>\$13,203.00</b>

**K&L GATES****K&L GATES LLP**  
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T 312.372.1121 F 312.827.8000 kl gates.com

Tax ID No. 25 0921018

Document Page 19 of 38

Velsicol Chemical, LLC  
Tim Horn, CEO  
10400 West Higgins Road, Ste. 700  
Rosemont, IL 60018

Invoice Date: October 14, 2024  
Invoice Number: 100086780  
K&L Gates Contact: David Rieser

---

**K&L Gates Reference:** 3724632.00003 - Velsicol – Environmental Issues

**For professional services rendered through September 30, 2024**

**INVOICE SUMMARY**

Professional Service Fees	<b><u>Total USD \$</u></b>
	36,761.00
<b>Total Current Invoice</b>	<b><u>\$36,761.00</u></b>

---

Due and Payable upon Receipt

Mail To: K&L Gates LLP, P.O. Box 830304, Philadelphia, PA 19182-0304

Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Rd-Ste 330, Mt. Laurel, NJ 08054-3415

Wire/ACH/EDI Instructions: Receiving Bank: PNC Bank N.A.,  
500 First Ave 92  
Pittsburgh, PA 15219

Beneficiary: K&L Gates LLP  
Acct No.: 1077692783

Routing/ABA: 043000096  
Swift Code: PNCCUS33

Please reference client/matter number in electronic payment details and email the remittance advice to [AccountsReceivableSEA@klgates.com](mailto:AccountsReceivableSEA@klgates.com) with invoice number(s) and amounts.

Velsicol Chemical, LLC

Invoice Date: October 14, 2024

Invoice Number: 100086780

K&amp;L Ref. Number: 3724632.00003

**DETAILS OF ACCOUNT****Professional Services**

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>	<b><u>Amount</u></b>
01-AUG-24	David Rieser	1.80	Review J. Schwartz (Debtor's counsel) memo re: bankruptcy claim (.30), review bankruptcy cases (1.20), email with TDEC re: costs (.30)	1,458.00
02-AUG-24	David Rieser	0.30	Email with T. Horn (Velsicol) re: D&M costs	243.00
05-AUG-24	David Rieser	1.20	Conference call with T. Horn (Velsicol) re: PRPs resolution	972.00
06-AUG-24	David Rieser	0.30	Email with G. Harvel (Velsicol) re: data room	243.00
07-AUG-24	David Rieser	0.30	Email with G. Harvel (Velsicol) re: data base access	243.00
08-AUG-24	David Rieser	4.40	Review consent decrees (.40), review bankruptcy case law (1.30), draft memo (2.70)	3,564.00
09-AUG-24	David Rieser	2.80	Draft memo on bankruptcy claims (2.60), emails with clients re: same (.20)	2,268.00
12-AUG-24	David Rieser	1.00	Conference with T. Horn (Velsicol) and G. Harvel (Velsicol) re: dischargeability of claims	810.00
13-AUG-24	Malory Pascarella	2.90	Research regarding dischargeability of CERCLA claims in bankruptcy (2.7); attend call with D. Rieser regarding same (0.2)	1,508.00
13-AUG-24	David Rieser	0.70	Conference and emails with M. Pascarella re: environmental research	567.00
14-AUG-24	Malory Pascarella	3.80	Research regarding dischargability of environmental claims in bankruptcy	1,976.00
15-AUG-24	Malory Pascarella	4.80	Research regarding dischargeability of environmental claims and disallowance of claims of other PRPs	2,496.00
16-AUG-24	Malory Pascarella	6.70	Draft analysis regarding dischargeability of environmental claims against debtor and disallowance of claims by PRPs (2.80); research re: same (3.40); correspondence with D. Rieser following up issues to same (.50)	3,484.00
16-AUG-24	David Rieser	0.80	Emails with M. Pascorella re: research re: environmental claims (.20); review memo re: same (.60),	648.00

Velsicol Chemical, LLC

Invoice Date: October 14, 2024

Invoice Number: 100086780

K&amp;L Ref. Number: 3724632.00003

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>	<u>Amount</u>
19-AUG-24	David Rieser	1.70	Review M. Pascenella memo (.50), email with client re: dischargeability arguments (.20), conference with client re: strategies (1.0)	1,377.00
21-AUG-24	David Rieser	1.20	Review TDEC offer (.40), conference with J. Schwartz (Debtor's counsel) re: offer (.30), conference with TDEC re: offer (.50)	972.00
22-AUG-24	David Rieser	0.40	Email with P. Bradford (TDEC's counsel) re: settlement process (.20), emails with client re: DOJ (.20)	324.00
26-AUG-24	David Rieser	1.20	Conference with B. Bradford (TDEC's counsel) re: NOD (.30), email with T. Horn (Velsicol) re: same (.20); conference with T. Horn (Velsicol) and G. Harvell (Velsicol) re: NOD and DOJ call (.70)	972.00
27-AUG-24	David Rieser	1.80	Email with P. Bradford (TDEC's counsel) re: NOD (.50), conference with M. Indriasano (USDOJ's counsel) re: DOJ issues (.90), emails with T. Horn (Velsicol) and J. Schwartz (Debtor's counsel) re: revised proposal (.40)	1,458.00
28-AUG-24	David Rieser	0.50	Emails re: TDEC response to offer	405.00
29-AUG-24	David Rieser	0.50	Emails with P. Bradford (TDEC's counsel) re: NOD Discussions (.30), emails with client re: Bradford (TDEC's counsel) discussion (.20)	405.00
03-SEP-24	David Rieser	2.40	Conference call with M. Indriasano (USDOJ's counsel) re: environmental issue (.50), conference with J. Schwartz (Debtor's counsel) re: same (.40); conference with P. Bradford (TDEC's counsel) re: TDEC (.50), email with T. Horn (Velsicol) and G. Harvell (Velsicol) re: same (1.0)	1,944.00
04-SEP-24	David Rieser	0.40	Email with T. Horn (Velsicol) re: RCRA deadline	324.00
05-SEP-24	David Rieser	1.00	Conference with client re: TDEC and DOJ discussions and next steps	810.00
09-SEP-24	David Rieser	2.80	Review ability to pay guidance (1.20), email with T. Horn (Velsicol) re: same (.30); emails with P. Bradford (TDEC's counsel) re: settlement (.40), email with T. Horn (Velsicol) re: public notice questions (.30), review notice re: same (.60)	2,268.00
10-SEP-24	David Rieser	0.40	Emails with T. Horn (Velsicol) re: ability to pay(.20), email with DOJ re: conference (.20)	324.00

Velsicol Chemical, LLC

Invoice Date: October 14, 2024

Invoice Number: 100086780

K&amp;L Ref. Number: 3724632.00003

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>	<u>Amount</u>
13-SEP-24	David Rieser	1.20	Email with T. Horn (Velsicol) re: ability to pay issues (.20), conference with P. Bradford (TDEC's counsel) re: EPA communications (.40), conference with J. Schwartz (Debtor's counsel) re: TDEC call (.60)	972.00
19-SEP-24	David Rieser	0.30	Email with J. Schwartz (Debtor's counsel) re: status of settlements	243.00
23-SEP-24	David Rieser	0.40	Emails with J. Schwartz (Debtor's counsel) re: fees and status of settlements (.20); email with T. Horn (Velsicol) re: same (.20)	324.00
24-SEP-24	David Rieser	0.70	Email with P. Bradford (TDEC's counsel) re: TDEC settlement (.20), email with J. Schwartz (Debtor's counsel) re: same (.30), email with J. Schwartz (Debtor's counsel) re:	567.00
25-SEP-24	David Rieser	1.80	contribution protection (.20) Review cases re: contribution protection (1.30), emails with J. Schwartz (Debtor's counsel) and G. Harvell (Velsicol) re: same (.30), email with J. Schwartz (Debtor's counsel) re: hearing (.20)	1,458.00
26-SEP-24	David Rieser	.40	Emails re: TOIC position and call (.30); emails with M. Indrisano (USDOJ's counsel) re: same (.30)	324.00
30-SEP-24	David Rieser	1.00	Conference call with T. Horn (Velsicol) and J. Schwartz (Debtor's counsel) re: settlement response and contribution protection	810.00

**Total Fees****51.90****\$36,761.00****TIMEKEEPER SUMMARY**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Malory Pascarella	18.20	520.00	9,464.00
David Rieser	33.70	810.00	27,297.00
<b>Total Fees</b>	<b>51.90</b>		<b>\$36,761.00</b>

**K&L GATES****K&L GATES LLP**  
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Tax ID No. 25 0921018

Page 23 of 38

Velsicol Chemical, LLC  
Tim Horn, CEO  
10400 West Higgins Road, Ste. 700  
Rosemont, IL 60018

Invoice Date: November 21, 2024  
Invoice Number: 100102788  
K&L Gates Contact: David Rieser

---

**K&L Gates Reference:** 3724632.00003 - Velsicol – Environmental Issues

**For professional services rendered through October 31, 2024**

**INVOICE SUMMARY**

	<b><u>Total USD \$</u></b>
Professional Service Fees	3,321.00
<b>Total Current Invoice</b>	<b><u>\$3,321.00</u></b>

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Due and Payable upon Receipt

Mail To: K&L Gates LLP, P.O. Box 830304, Philadelphia, PA 19182-0304

Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Rd-Ste 330, Mt. Laurel, NJ 08054-3415

Wire/ACH/EDI Instructions: Receiving Bank: PNC Bank N.A.,  
500 First Ave 92  
Pittsburgh, PA 15219

Beneficiary: K&L Gates LLP  
Acct No.: 1077692783

Routing/ABA: 043000096  
Swift Code: PNCCUS33

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Velsicol Chemical, LLC

Invoice Date: November 21, 2024

Invoice Number: 100102788

K&amp;L Ref. Number: 3724632.00003

**DETAILS OF ACCOUNT****Professional Services**

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>	<b><u>Amount</u></b>
01-OCT-24	David Rieser	0.80	Communicate with M. Indrisano (USDOJ's counsel) re: EPA approach to settlement (.40), communicate with T. Horn (Velsicol) re: DOJ call (.40)	648.00
11-OCT-24	David Rieser	0.30	Communicate with T. Horn (Velsicol) re: Arlington overnight bill	243.00
28-OCT-24	David Rieser	0.40	Communicate with T. Horn (Velsicol) and G. Harvell (Velsicol) re: DOJ discussions and next steps	324.00
30-OCT-24	David Rieser	2.20	Communicate with T. Horn (Velsicol) re: EPA relief (.30), draft memo re: same (1.30), communicate with T. Horn (Velsicol) re: same (.30); communicate with G. Harvell (Velsicol) re: relief memo (.30)	1,782.00
31-OCT-24	David Rieser	0.40	Communicate with G. Harvell (Velsicol) re: EPA relief (.20), communicate with T. Horn (Velsicol) re: same (.20)	324.00
<b>Total Fees</b>		<b>4.10</b>		<b>\$3,321.00</b>

**TIMEKEEPER SUMMARY**

<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Rate</u></b>	<b><u>Amount</u></b>
David Rieser	4.10	810.00	3,321.00
<b>Total Fees</b>	<b>4.10</b>		<b>\$3,321.00</b>



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Tax ID No. 25 0921018

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Velsicol Chemical, LLC  
Tim Horn, CEO  
10400 West Higgins Road, Ste. 700  
Rosemont, IL 60018

Invoice Date: December 6, 2024  
Invoice Number: 100107786  
K&L Gates Contact: David Rieser

---

**K&L Gates Reference:** 3724632.00003 - Velsicol – Environmental Issues

**For professional services rendered through November 30, 2024**

**INVOICE SUMMARY**

Professional Service Fees	<b><u>Total USD \$</u></b>
	6,318.00
<b>Total Current Invoice</b>	<b><u>\$6,318.00</u></b>

---

Due and Payable upon Receipt

Mail To: K&L Gates LLP, P.O. Box 830304, Philadelphia, PA 19182-0304

Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Rd-Ste 330, Mt. Laurel, NJ 08054-3415

Wire/ACH/EDI Instructions: Receiving Bank: PNC Bank N.A.,  
500 First Ave 92  
Pittsburgh, PA 15219

Beneficiary: K&L Gates LLP  
Acct No.: 1077692783

Routing/ABA: 043000096  
Swift Code: PNCCUS33

Please reference client/matter number in electronic payment details and email the remittance advice to [AccountsReceivableSEA@klgates.com](mailto:AccountsReceivableSEA@klgates.com) with invoice number(s) and amounts.

Velsicol Chemical, LLC

Invoice Date: December 6, 2024

Invoice Number: 100107786

K&amp;L Ref. Number: 3724632.00003

**DETAILS OF ACCOUNT****Professional Services**

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>	<b><u>Amount</u></b>
01-NOV-24	David Rieser	1.80	Communicate with T. Horn (Velsicol) and J. Schwartz (Debtor's counsel) re: DOJ relief (.40), review J. Schwartz (Debtor's counsel) settlement documents (1.20); communicate with J. Schwartz (Debtor's counsel) re: same (.20)	1,458.00
05-NOV-24	David Rieser	0.30	Communicate with T. Horn (Velsicol) re: next steps	243.00
06-NOV-24	David Rieser	2.40	Communicate with T. Horn (Velsicol) re: DOJ language (.30), communicate with J. Schwartz (Debtor's counsel) re: same (.20), draft language for DOJ (1.40), communicate with G. Harvell (Velsicol) re: background (.30), communicate with T. Horn (Velsicol) re: revised language (.20)	1,944.00
11-NOV-24	David Rieser	1.80	Draft definitions of Memphis site (.80), review prior descriptions re: same (.50); communicate with J. Schwartz (Debtor's counsel) re: same (.30); communicate with G. Harvell (Velsicol) re: descriptions (.20)	1,458.00
12-NOV-24	David Rieser	1.20	Communicate with P. Bradford (TDEC's counsel) re: TDEC settlement (.20), communicate with J. Schwartz (Debtor's counsel) re: TDEC settlement (.30); communicate with M. Indrisano (USDOJ's counsel) re: meeting on EPA issues (.40), communicate with J. Schwartz (Debtor's counsel) and M. Indrisano (USDOJ's counsel) re: settlement (.30)	972.00
13-NOV-24	David Rieser	0.30	Communicate with J. Schwartz (Debtor's counsel) re: plan and next steps	243.00
<b>Total Fees</b>		<b>7.80</b>		<b>\$6,318.00</b>

**TIMEKEEPER SUMMARY**

<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Rate</u></b>	<b><u>Amount</u></b>
David Rieser	7.80	810.00	6,318.00
<b>Total Fees</b>	<b>7.80</b>		<b>\$6,318.00</b>

# **EXHIBIT 2**

**K&L GATES****K&L GATES LLP**  
Document Page 28 of 38

70 WEST MADISON STREET

SUITE 3100

CHICAGO, IL 60602-4207

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Tax ID No. 25 0921018

Velsicol Chemical, LLC  
Tim Horn, CEO  
10400 West Higgins Road, Ste. 700  
Rosemont, IL 60018

Invoice Date: July 17, 2024  
Invoice Number: 100139071  
K&L Gates Contact: David Rieser

---

**K&L Gates Reference:** 3724632.00002 - Environmental Issues in Velsicol Bankruptcy

**For professional services rendered through June 30, 2024**

**INVOICE SUMMARY**

	<b><u>Total USD \$</u></b>
Professional Service Fees	216.00
<b>Total Current Invoice</b>	<b>\$216.00</b>

---

Due and Payable upon Receipt

Mail To: K&L Gates LLP, P.O. Box 830304, Philadelphia, PA 19182-0304

Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Rd-Ste 330, Mt. Laurel, NJ 08054-3415

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Velsicol Chemical, LLC

Invoice Date:

July 17, 2024

Invoice Number:

100139071

K&amp;L Ref. Number:

3724632.00002

**DETAILS OF ACCOUNT****Professional Services**

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>	<u>Amount</u>
12-JUN-24	Jon Edel	0.30	Various communications with D. Rieser, M. Westbrook, C. Kenrick re Velsicol retenion app/conflicts issues	216.00
<b>Total Fees</b>		<b>0.30</b>		<b>\$216.00</b>

**TIMEKEEPER SUMMARY**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Jon Edel	0.30	720.00	216.00
<b>Total Fees</b>	<b>0.30</b>		<b>\$216.00</b>

**K&L GATES**

**K&L GATES LLP**  
Document Page 30 of 38  
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SUITE 3100  
CHICAGO, IL 60602-4207  
T 312.372.1121 F 312.827.8000 klgates.com  
Tax ID No. 25 0921018

Velsicol Chemical, LLC  
Tim Horn, CEO  
10400 West Higgins Road, Ste. 700  
Rosemont, IL 60018

Invoice Date: August 23, 2024  
Invoice Number: 100064553  
K&L Gates Contact: David Rieser

**K&L Gates Reference:** 3724632.00002 - Environmental Issues in Velsicol Bankruptcy

**For professional services rendered through July 31, 2024**

**INVOICE SUMMARY**

Professional Service Fees	<b><u>Total USD \$</u></b>
	6,480.00
<b>Total Current Invoice</b>	<b><u>\$6,480.00</u></b>

Due and Payable upon Receipt

Mail To: K&L Gates LLP, P.O. Box 830304, Philadelphia, PA 19182-0304

Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Rd-Ste 330, Mt. Laurel, NJ 08054-3415

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Please reference client/matter number in electronic payment details and email the remittance advice to [AccountsReceivableSEA@klgates.com](mailto:AccountsReceivableSEA@klgates.com) with invoice number(s) and amounts.

Velsicol Chemical, LLC

Invoice Date:

August 23, 2024

Invoice Number:

100064553

K&amp;L Ref. Number:

3724632.00002

**DETAILS OF ACCOUNT****Professional Services**

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>	<b><u>Amount</u></b>
03-JUL-24	Jon Edel	0.40	Communicate with D. Rieser re status of Velsicol retention (.20); review and analyze recent pleadings re same (.20)	288.00
09-JUL-24	Jon Edel	0.30	Communicate with D. Rieser, M. Westbrook re application to serve as special counsel in Velsicol bankruptcy case (.10); review and analyze precedent re: same (.20)	216.00
10-JUL-24	Jon Edel	3.30	Draft retention application for KLG as special counsel (1.50); draft Rieser declaration in support of same (.50); research re same (.70); various communications with D. Rieser, Accounting team re information for same (.30); communicate with C. Kenrick re conflicts check and status (.10); communicate with M. Westbrook re draft (.20)	2,376.00
11-JUL-24	Jon Edel	1.50	Review and revise application to employ KLG as special counsel (1.20); communicate with M. Westbrook re same (.30)	1,080.00
12-JUL-24	Jon Edel	0.30	Various communications with M. Westbrook, D. Rieser re status of KLG retention application and next steps	216.00
16-JUL-24	Jon Edel	0.80	Various communications with D. Rieser, M. Westbrook, C. Kenrick re finalizing KLG retention application and exhibits (.10); review and revise same (.30); prepare exhibits for same (.40)	576.00
17-JUL-24	Jon Edel	0.50	Various communications with M. Westbrook, D. Rieser, C. Kenrick re conflicts issues (.20); review and revise KLG retention app re same (.30)	360.00
18-JUL-24	Jon Edel	0.30	Communicate with M. Westbrook re status of Velsicol retention application	216.00
19-JUL-24	Jon Edel	0.30	Various communications with K. Fabi, M. Westbrook re Engagement Letter disclosure and retention application	216.00
20-JUL-24	Jon Edel	0.20	Communicate with M. Westbrook re retention application	144.00

Velsicol Chemical, LLC

Invoice Date: August 23, 2024

Invoice Number: 100064553

K&amp;L Ref. Number: 3724632.00002

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>	<u>Amount</u>
22-JUL-24	Jon Edel	0.40	Various communications with J. Schwartz (Much Shelist), M. Westbrook, D. Rieser re KLG retention application (.20); review and finalize same (.20)	288.00
23-JUL-24	Jon Edel	0.40	Various communications with J. Schwartz (Much Shelist), M. Westbrook, D. Rieser, accounting team re comments to KLG retention application (.20); review and revise same (.20)	288.00
24-JUL-24	Jon Edel	0.30	Finalize KLG retention application (.20); various communications with J. Schwartz (Much Shelist), D. Rieser, M. Westbrook re same and next steps (.10)	216.00
<b>Total Fees</b>		<b>9.00</b>		<b>\$6,480.00</b>

**TIMEKEEPER SUMMARY**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Jon Edel	9.00	720.00	6,480.00
<b>Total Fees</b>	<b>9.00</b>		<b>\$6,480.00</b>



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Tax ID No. 25 0921018

Page 33 of 38

Velsicol Chemical, LLC  
Tim Horn, CEO  
10400 West Higgins Road, Ste. 700  
Rosemont, IL 60018

Invoice Date: October 14, 2024  
Invoice Number: 100086781  
K&L Gates Contact: David Rieser

---

**K&L Gates Reference:** 3724632.00002 - Environmental Issues in Velsicol Bankruptcy

**For professional services rendered through September 30, 2024**

**INVOICE SUMMARY**

Professional Service Fees	<b><u>Total USD \$</u></b>
	144.00
<b>Total Current Invoice</b>	<b><u>\$144.00</u></b>

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Velsicol Chemical, LLC

Invoice Date:

October 14, 2024

Invoice Number:

100086781

K&amp;L Ref. Number:

3724632.00002

**DETAILS OF ACCOUNT****Professional Services**

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>	<u>Amount</u>
16-AUG-24	Jon Edel	0.20	Various communications with J. Schwartz (debtor's counsel) re fee application procedures	144.00
<b>Total Fees</b>		<b>0.20</b>		<b>\$144.00</b>

**TIMEKEEPER SUMMARY**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Jon Edel	0.20	720.00	144.00
<b>Total Fees</b>	<b>0.20</b>		<b>\$144.00</b>

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Velsicol Chemical, LLC  
Tim Horn, CEO  
10400 West Higgins Road, Ste. 700  
Rosemont, IL 60018

Invoice Date: November 21, 2024  
Invoice Number: 100102787  
K&L Gates Contact: David Rieser

**K&L Gates Reference:** 3724632.00002 - Environmental Issues in Velsicol Bankruptcy

**For professional services rendered through October 31, 2024**

**INVOICE SUMMARY**

	<b><u>Total USD \$</u></b>
Professional Service Fees	576.00
<b>Total Current Invoice</b>	<b>\$576.00</b>

Due and Payable upon Receipt

Mail To: K&L Gates LLP, P.O. Box 830304, Philadelphia, PA 19182-0304

Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Rd-Ste 330, Mt. Laurel, NJ 08054-3415

Wire/ACH/EDI Instructions: Receiving Bank: PNC Bank N.A.,  
500 First Ave 92  
Pittsburgh, PA 15219

Beneficiary: K&L Gates LLP  
Acct No.: 1077692783

Routing/ABA: 043000096  
Swift Code: PNCCUS33

Please reference client/matter number in electronic payment details and email the remittance advice to [AccountsReceivableSEA@klgates.com](mailto:AccountsReceivableSEA@klgates.com) with invoice number(s) and amounts.

Velsicol Chemical, LLC

Invoice Date: November 21, 2024

Invoice Number: 100102787

K&amp;L Ref. Number: 3724632.00002

**DETAILS OF ACCOUNT****Professional Services**

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>	<b><u>Amount</u></b>
31-OCT-24	Jon Edel	0.80	Communicate with M. Westbrook, L. Honsi re new conflict disclosure (.30); draft supplemental disclosure re same (.50)	576.00
<b>Total Fees</b>		<b>0.80</b>		<b>\$576.00</b>

**TIMEKEEPER SUMMARY**

<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Rate</u></b>	<b><u>Amount</u></b>
Jon Edel	0.80	720.00	576.00
<b>Total Fees</b>	<b>0.80</b>		<b>\$576.00</b>

**K&L GATES****K&L GATES LLP**  
70 WEST MADISON STREET

SUITE 3100

CHICAGO, IL 60602-4207

T 312.372.1121 F 312.827.8000 kl gates.com

Tax ID No. 25 0921018

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Velsicol Chemical, LLC  
Tim Horn, CEO  
10400 West Higgins Road, Ste. 700  
Rosemont, IL 60018

Invoice Date: December 6, 2024  
Invoice Number: 100107785  
K&L Gates Contact: David Rieser

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**K&L Gates Reference:** 3724632.00002 - Environmental Issues in Velsicol Bankruptcy

**For professional services rendered through November 30, 2024**

**INVOICE SUMMARY**

Professional Service Fees	<b><u>Total USD \$</u></b>
	4,248.00
<b>Total Current Invoice</b>	<b><u>\$4,248.00</u></b>

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Due and Payable upon Receipt

Mail To: K&L Gates LLP, P.O. Box 830304, Philadelphia, PA 19182-0304

Overnight/Courier: PNC Bank C/O K&L Gates LLP, Lockbox #830304, 525 Fellowship Rd-Ste 330, Mt. Laurel, NJ 08054-3415

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Beneficiary: K&L Gates LLP  
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Swift Code: PNCCUS33

Please reference client/matter number in electronic payment details and email the remittance advice to [AccountsReceivableSEA@klgates.com](mailto:AccountsReceivableSEA@klgates.com) with invoice number(s) and amounts.

Velsicol Chemical, LLC

Invoice Date: December 6, 2024

Invoice Number: 100107785

K&amp;L Ref. Number: 3724632.00002

**DETAILS OF ACCOUNT****Professional Services**

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>	<b><u>Amount</u></b>
06-NOV-24	Jon Edel	0.20	Various communications with conflicts team re supplemental disclosure	144.00
15-NOV-24	Jon Edel	0.40	Various communications with J. Schwartz (Velsicol counsel), D. Rieser, M. Westbrook re fee application	288.00
16-NOV-24	Jon Edel	0.30	Research re fee application in ND III	216.00
17-NOV-24	Jon Edel	1.80	Draft fee application (1.40), research re same (.40)	1,296.00
18-NOV-24	Jon Edel	1.30	Prepare schedules to first interim fee application (.30); review and revise first interim fee application re same (.70); various communications with J. Schwartz (Much Shelist), D. Rieser, S. Castro re same (.30)	936.00
19-NOV-24	Jon Edel	1.60	Various communications with D. Rieser, S. Castro re fee application status and additional items (.30); review and revise invoices for same (1.30)	1,152.00
20-NOV-24	Jon Edel	0.30	Various communications with S. Castro re revisions to time entries	216.00
<b>Total Fees</b>		<b>5.90</b>		<b>\$4,248.00</b>

**TIMEKEEPER SUMMARY**

<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Rate</u></b>	<b><u>Amount</u></b>
Jon Edel	5.90	720.00	4,248.00
<b>Total Fees</b>	<b>5.90</b>		<b>\$4,248.00</b>